

GOTLIB LAW


REQUEST GRANTED.

The Court approves the temporary modification to the terms of Ms. Borges's bond to permit her to travel as proposed.

June 17, 2024

Via ECF

6/18/2024 SO ORDERED.



LEWIS J. LIMAN
United States District Judge

The Honorable Lewis J. Liman
United States District Court Judge
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Raquel Moura Borges*, 21 Cr. 172 (LJL)

Dear Judge Liman:

I write, with the consent of the U.S. Pretrial Services Office (“Pretrial”) and without objection from the government, to respectfully request that the terms of Ms. Borges’s bond be temporarily modified to permit her to travel to Orlando, Florida and all points in between Orlando, Florida and Scarsdale, New York from June 23 through July 5, 2024.

Ms. Borges was arrested on July 27, 2022, and charged with one count each of securities fraud, wire fraud, and investment adviser fraud. Ms. Borges was released on bond that same day. Ms. Borges’s conditions of release include, among others, her travel restricted to the Southern and Eastern Districts of New York and the District of Connecticut. Ms. Borges has complied with all the conditions of her pretrial release to date.

The requested temporary travel modification would allow Ms. Borges to take her two daughters on a vacation to celebrate her older daughter’s graduation from high school. I have provided general information regarding the details of Ms. Borges’s travel to the government and Pretrial. If the Court approves this request, I will provide the government and Pretrial with detailed information concerning her travel plans once they are confirmed. Pretrial Officer Shannon Finneran consents to this request and the government defers to Pretrial.

Accordingly, we respectfully request that the Court modify the terms of Ms. Borges’s pretrial release to permit her to travel to Orlando, Florida and all points in between Orlando, Florida and Scarsdale, New York from June 23 through July 5, 2024. I thank the Court for its consideration.

Respectfully Submitted,

/s/

Valerie A. Gotlib

Cc: Mathew Shahabian, Assistant U.S. Attorney (*via* ECF & Email)
Shannon Finneran, U.S. Pretrial Officer (*via* Email)